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General Cable Company INDIANA STEEL & WIRE DIVISION

2000 East Jackson Street, P.O. Box 2647, Muncie, Indiana 47302 (317) 288-3601

January 11, 1983

Mr. Miles Morse
U. S. Environmental Protection Agency
WH - 565
401 M Street S.W.
Washington, D.C. 20460

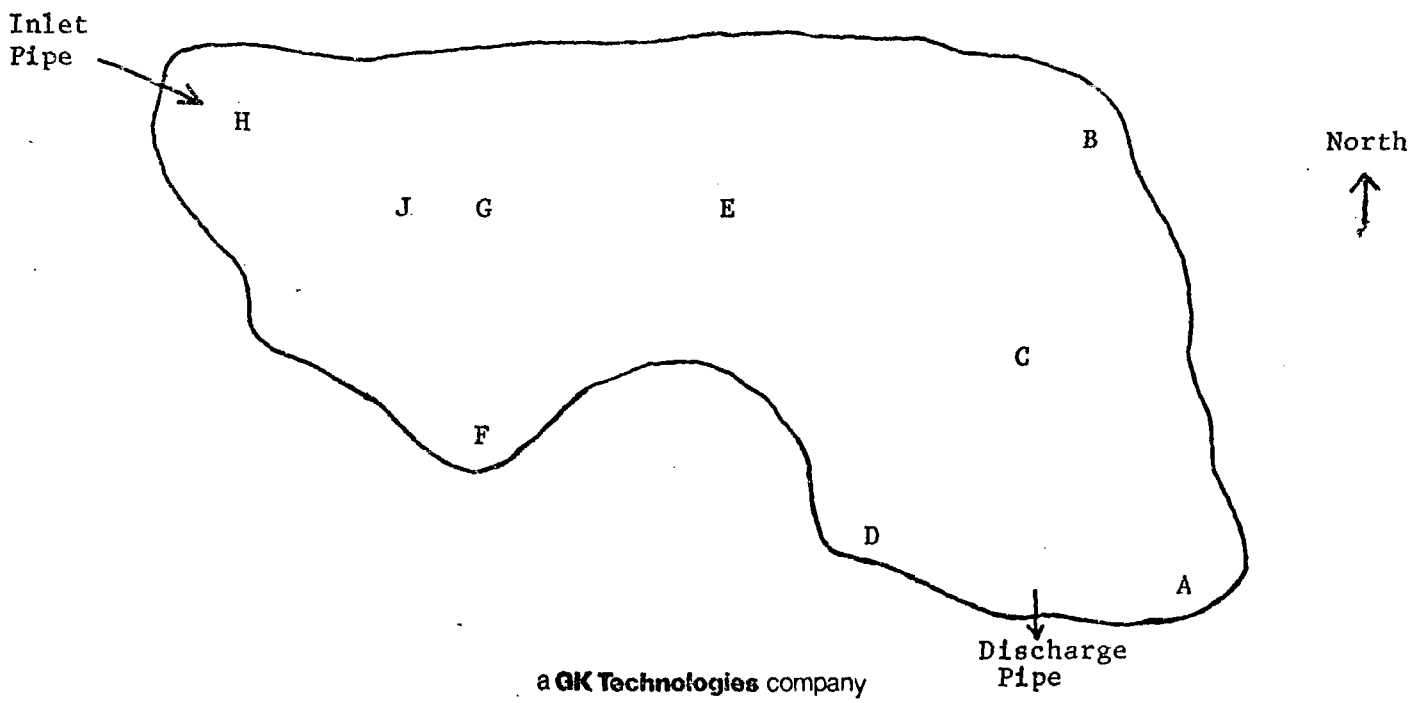
RE: Petition to delist sludge in Stone Quarry.
EPA ID No. IND 041855776

Dear Mr. Morse:

Last week Mr. Tom Ambrose from our Corporate office called you regarding our petition for the classification of sludge in an old stone quarry as non-hazardous. I am writing to provide you with the additional information you requested during your phone conversation with Mr. Ambrose.

The quarry was used for disposal of sludge since 1962. The use of the cyanide process which was the source of cyanide sludge was discontinued in 1975. The upgrading of our wastewater treatment facilities in 1977 virtually eliminated the further addition of sludge to the quarry except for an occasional upset of the wastewater treatment facility.

Below is a sketch of the quarry showing the surface profile inlet and discharge points. Different sites are identified where the sludge and quarry depths were measured and samples were collected.



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Site	Quarry Depth	Thickness of Sludge Layer
A	15 Feet	3 Feet
B	21	5
C	27	8
D	16	2
E	27	19
F	31	28
G	31	24
H	23	21
J	24	17

The depths were determined by pushing 1" and 3/4" pipe through the sludge layer until refusal. The length of pipe from the water surface to point of refusal was called the quarry depth. The sludge depth was then said to be the length of pipe which had sludge residue on the outside surface of the pipe at the point of refusal. It was noted in some cases where the sludge layer was very thick, that the sludge residue on the outside of the pipe extended over a greater length of pipe than the sludge inside the pipe. We were unable to get sludge samples at great depths where the sludge was very thick, because of this. When collecting samples, we would only take samples when the sludge on the outside of the pipe and on the inside of pipe were at the same height on the pipe.

The samples were collected at the following locations:

Sample	Sample Date	Site	Depth of Sample Into Sludge Layer
S1	3-23-81	G	5 - 8 Feet
S2	3-23-81	G	2 - 5
S3	3-23-81	J	6 - 9
S4	3-23-81	J	3 - 6
S5	3-23-81	J	0 - 3
F1	2-22-82	F	18 - 21
F2	2-22-82	F	15 - 18
G1	2-22-82	G	13 - 16
G2	2-22-82	G	10 - 13
H1	2-22-82	H	10 - 13
H2	2-22-82	H	7 - 10

All samples were collected and analyzed by Mr. Mark Hogan and myself. Mark, a degreed biologist, has been our wastewater treatment facility operator and chemist for the past three years. He works under my supervision. I am

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an ACS certified chemist with an M.S. degree and nine years experience in the environmental field.

I hope this letter answers all your questions and that you are able to process our petition in a timely fashion. Should you have further questions, please feel free to call me at 317-288-3601.

I certify under penalty of law that I have personally examined and am familiar with the information submitted and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Gregory W. Clark
Plant Chemical and Environmental Engineer

GWC:bsw

cc: Mr. R. Shandross, U. S. EPA, Region V
Mr. T. Ambrose, Penn Central
Mr. L. Langlotz, Indiana State Board of Health